

DATE	TIME	BY	DESCRIPTION
			production (A000402 - A001668); work on processing selected documents for key documents
04/22/05	0.20	MFK	meeting with D. Kakazu re [REDACTED]
04/22/05	1.90	DKK	work on [REDACTED]; work on privilege log; emails back & forth with M. Kuo re key documents notebooks; confer with M. Kuo re incomplete agreements for production
04/22/05	0.80	KAS	work on privilege log
04/22/05	0.70	SWL	work on preparing/processing selected documents to be used as key documents
04/25/05	0.50	KAS	work on privilege log
04/25/05	1.50	SWL	work on preparing key documents binder
04/26/05	0.30	DKK	catalog client's documents; compose email to M. Kuo re [REDACTED]
04/27/05	0.20	MFK	call from J. Carmicheal on [REDACTED]; email to P. Alston on [REDACTED]
04/27/05	0.30	DKK	catalog initial disclosure and discovery requests & responses; work on witness files
04/28/05	0.10	PA	email from and to M. Kuo re [REDACTED]
04/28/05	0.90	MFK	calls (two) to Richard Sutton (GMP's counsel) and follow-up email re GMP's responses to document request and production of documents and Synagro's production of document; email to P. Alston [REDACTED]; review batestamped and redacted documents for production; review pleading files to confirm inclusion of all supportive documents and to

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			replace marked copies of responsive documents; email to D. Kakazu on same and updating production to include additional documents
04/28/05	0.70	DKK	work on additional client documents for production; confer with M. Kuo re same; emails back & forth with M. Kuo re privilege log
04/29/05	0.10	MFK	call from R. Sutton (GMP's counsel) re service of responses, production of documents, and re-scheduling 30(b)(6) deposition; email to P. Alston [REDACTED]
05/02/05	0.40	MFK	calls to and from D. Sutton (GMP's counsel - left messages) regarding review and production of GMP's responsive documents and rescheduling deposition date; emails to and from P. Alston [REDACTED]; email to D. Sutton confirming voicemessages on same
05/02/05	0.10	DKK	follow up with document clerks re production date of client's documents in response to discovery request
05/02/05	1.20	SWL	work on updating substantive pleadings and discovery binder
05/03/05	0.90	DKK	work on privilege log
05/04/05	0.10	MFK	call to D. Sutton (left message) re GMP's production of documents and re-scheduling of 30(b)(6) deposition
05/06/05	0.40	MFK	calls (2 - left message) to Sutton re production and review of GMP's documents; email to Sutton on same; email to J. Carmicheal updating on document production and discovery; draft amended notice of deposition
05/09/05	0.20	DKK	research [REDACTED]; follow up with M. Kuo re same
05/12/05	0.20	MFK	calls to Dick Sutton (left message) and with Dan Chen re GMP's production of documents; emails from and to J. Carmicheal updating on status of production and discovery

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05/13/05	0.10	MFK	call with D. Chen re scheduling of GMP production
05/16/05	1.10	MFK	review draft and revise Synagro's privilege log to final for production to GMP; calls to Professional Image and Dan Chen (GMP counsel) on scheduling copying of GMP's production
05/18/05	0.20	PA	review privilege log
05/24/05	0.30	DKK	research re production of privilege log to R. Sutton, Esq.; confer with B. Kawagoe re same
05/25/05	0.20	JB	work on preparing files for Synagro privilege documents and Synagro redacted documents
05/26/05	0.30	DKK	confer with M. Kuo re [REDACTED], documents produced by GMP and calculating approximate cost for our document production for R. Sutton, Esq.; work on amended oral deposition notice
06/07/05	0.10	MFK	email to R. Sutton (GMP counsel) re question on cost of production
06/07/05	0.30	DKK	work on calculating cost of production of client's documents to GMP's counsel; follow up with M. Kuo re same
06/14/05	0.40	DKK	compile/prepare client's documents for production and letter to Richard Sutton, Esq.
06/17/05	0.20	MFK	emails to and from J. Carmicheal re [REDACTED]
07/11/05	2.00	MFK	review GMP's production of documents responsive to Synagro's document request and GMP's initial disclosures to identify key documents and information as supporting exhibits and in preparation of 30(b)(6) deposition

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07/11/05	0.20	DKK	research re deadline to file discovery motions and discovery cutoff; compose email to P. Alston and M. Kuo re same
07/13/05	0.60	MFK	review document request to GMP and compare with documents produced by GMP; draft email to D. Sutton on discrepancy between documents produced and outstanding, and request to supplement production at deposition
08/03/05	0.30	MFK	follow up call to R. Sutton (left message) re additional production of documents and scheduling of depositions; email to R. Sutton setting forth unreturned calls and email, demanding remaining production and description of documents, and scheduling depositions
08/11/05	0.60	MFK	draft letter to R. Sutton confirming conversation regarding scheduling of depositions and production of documents deadline; review and revise letter to final for send out; review GMP's initial disclosures on additional witnesses and relevance to case
08/11/05	0.20	DKK	research re discovery cut-off, hearing & non-dispositive motions deadline; compose email to M. Kuo & P. Alston re same
08/12/05	0.40	MFK	review scheduling order and GMP's initial disclosures on witnesses
08/18/05	0.20	MFK	call with Peter Melnyk re scheduling of review of supplemental documents at GMP's office; calls (two) to Debbie (Sutton's secretary) re production of GMP's supplemental documents produced at deposition; call and email with D. Kakazu re reproduction of produced documents
08/22/05	0.10	MFK	call from Peter Melnyk regarding scheduling of GMP production review of project work files; calls to and from Debbie (D. Sutton's secretary) regarding production of GMP's supplemental responsive documents



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08/22/05	0.50	DKK	telephone conference with Debbie at Richard Sutton's office to coordinate document production; work on same
08/23/05	0.40	DKK	work on GMP's supplemental document production
08/24/05	0.60	DKK	review documents produced by GMP returned from Professional Image; follow up with document clerks re verification of GMP numbering series
08/24/05	0.70	JB	work on verifying documents produced by GMP on 8/23/05; work on preparing file re same
08/25/05	0.20	PA	email from and to M. Kuo re discovery and scheduling
08/25/05	0.60	MFK	document review of supplemental production of documents re to on-going work production and correspondence at GMP's office; meeting with P. Melnyk re supplemental documents
08/25/05	0.90	DKK	compile/prepare GMP's original document production and letter for return to same; telephone conference with M. Kuo from Peter Mylnek's office re document production & rescheduling oral deposition and court reporter for Mr. Guirguis's oral deposition; telephone conference with Abe at Professional Image to coordinate same; confer with S. Lee re exhibits from Peter Mylnek's oral depositions; compose email re numbering process of documents obtained from Peter Mylneck's office
08/26/05	0.10	DKK	telephone conference with Malcom at Professional Image re note on GMP's original documents re numbering documents
08/29/05	0.70	DKK	review documents produced by GMP (Peter Mylneck) on 8/29/05; catalog same
08/30/05	1.60	JB	work on processing documents produced by GMP (Peter Mylnek) on 8/29/05

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08/31/05	0.20	MFK	email and call to D. Kakazu re GMP's supplemental production of documents and exhibit compilation
08/31/05	3.70	JB	continue work on processing documents produced by GMP (Peter Mylnek) on 8/29/05
09/01/05	3.20	JB	continue work on processing documents produced by GMP (Peter Mylnek) on 8/29/05
09/02/05	0.30	JB	work on preparing files for documents produced by GMP (Peter Mylnek) on 8/29/05
09/08/05	0.30	MFK	review of CCH files for contact information for Frank Doyle; call (left message) Frank Doyle re identification in GMP's initial disclosures
09/08/05	0.40	DKK	research re production of Synagro's documents; follow up with M. Kuo re same
09/09/05	0.30	MFK	emails and meeting with D. Kakazu re Synagro's production of documents and confirmation of delivery date; review emails to and from Sutton on request and delivery of same
09/11/05	0.10	PA	review correspondence re additional production of documents
09/12/05	2.90	SWL	work on verifying documents produced by GMP (GMP - 0001 - GMP 1259)
09/16/05	0.30	PA	work on discovery issues
09/16/05	0.30	DKK	work on witness files; catalog discovery requests and responses & settlement conference statement; update document production indices
09/19/05	0.30	DKK	research re GMP's production of documents
09/19/05	0.60	JB	work on preparing witness files for Wagdy Guirguis and Peter Melnyk, Ph.D., P.E.; work on updating substantive

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			pleadings and discovery binders
09/23/05	0.50	DKK	research re documents obtained from Peter Mylnek's office; telephone conference with Debbie at Dick Sutton's office to coordinate production of documents
09/28/05	0.20	DKK	work on updating witness file
09/29/05	1.80	MFK	review supplemental production of responsive documents from clients re pricing proposals to CCH, attachments denoting prices breakdowns, correspondence on same, and CCH's invitation for bid on project; call and email to J. Hecht (left message to call) re questions on same
09/30/05	0.40	MFK	meeting with P. Melynk and R. Sutton re status and clarification of GMP's document productions and batestamping, supplemental production of documents by GMP re correspondence with Synagro, Andritz, and CBI, rescheduling of deposition of P. Melnyk, and vacating of trial date pending motion for summary judgment
09/30/05	0.30	DKK	assist N. Kanada with numbering of additional GMP documents
09/30/05	2.50	NMK	conference with D. Kakazu re document production and bate stamping series; prepare supplemental client documents for production; process duplicate set of documents obtained from R. Melnick for bate stamping; update case binder and discovery charts; update substantive/discovery pleading notebooks and review same for status
09/30/05	0.50	JB	work on processing documents produced by GMP (Peter Mylnek) on 9/30/05
09/30/05	1.40	SWL	work on preparing/processing Synagro's supplemental documents produced on 9/30/05 (A001711 - A001785); work on preparing/processing documents produced by GMP (Peter Mylnek) on 9/30/05 (G001271 - G001883)



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10/03/05	1.80	NMK	process documents produced from Mylnek for production to R. Sutton; prepare transmittal letter with enclosures to R. Sutton; update master document and production logs re same
10/03/05	1.60	JB	work on preparing file for documents produced by GMP (Peter Mylnek) on 9/30/05; work on production of GMP (Peter Mylnek) documents
10/04/05	0.60	MFK	calls (three) with D. Habiv (GMP counsel) on supplemental documents, production of same, and nature of same
10/04/05	0.20	SWL	work on preparing/processing Synagro's supplemental documents produced on 10/5/05 (A001786 - A001827)
10/12/05	1.50	NMK	review and organize supplemental documents and drawings produced from GMP; catalog and index documents into discovery charts
10/14/05	0.20	PA	emails to and from M. Kuo regarding discovery and trial setting
10/19/05	0.40	SWL	work on preparing/processing documents produced by GMP (Peter Melnyk) on 10/3/05 (G001884 - G002019)
10/26/05	0.40	JB	work on updating substantive pleadings binders
11/07/05	1.70	NMK	update master document indices and charts; prepare pleadings summary chart; organize and prepare files for documents produced and obtained from various parties

#### **D. DEPOSITIONS**

DATE	TIME	BY	DESCRIPTION
04/27/05	0.90	PA	email from and to M. Kuo re [REDACTED]; review documents from client



DATE	TIME	BY	DESCRIPTION
04/28/05	0.40	DKK	coordinate oral deposition arrangements for GMP Hawaii's 30 (b) (6) oral deposition
05/02/05	0.10	PA	email from and to M. Kuo re [REDACTED]
05/25/05	0.10	MFK	call with Sutton re rescheduling GMP 30(b)(6) deposition
06/01/05	0.10	MFK	call from J. Carmichael re update on GMP deposition
06/12/05	0.10	PA	email from and to M. Kuo re depo schedule
06/13/05	0.20	MFK	email from D. Sutton re rescheduling 30(b)(6) deposition because of deponent's unavailability; emails with P. Alston on same; call to D. Sutton on rescheduling 30(b)(6) deposition (left message)
06/14/05	0.10	MFK	call to Dick Sutton re GMP's request to continue deposition and potential dates
06/17/05	0.10	PA	email from and to M. Kuo re depo scheduling
06/17/05	0.20	MFK	calls and emails to D. Sutton (GMP counsel) to reschedule 30(b)(6) deposition; email to P. Alston on [REDACTED]; call to D. Sutton (left message) on conflict with date and alternative dates
06/21/05	0.10	MFK	call to D. Sutton (left message) on rescheduling 30(b)(6) deposition and alternatives dates in early July
06/23/05	0.20	MFK	call to R. Sutton (GMP) counsel on rescheduling 30(b)(6) deposition (left message); email on same; meeting with P. Alston re [REDACTED]
06/24/05	0.20	MFK	email to D. Sutton re rescheduling of 30b6 deposition and issuance of notice; review amended notice for service

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07/12/05	4.50	MFK	emails to and from J. Carmicheal re [REDACTED]; draft deposition outline in preparation of 30(b)(6) deposition
07/13/05	0.80	DKK	meet with M. Kuo re preparing oral deposition exhibits; work on same
07/13/05	0.30	JB	work on compiling deposition exhibits
07/13/05	1.70	SWL	work on preparing selected documents to be used for deposition
07/14/05	6.40	MFK	continue drafting 30(b)(6) outline of deposition questions and references to GMP's key document; review Synagro's key documents to locate supporting exhibits for deposition; review complaint, counterclaim, and motions pleadings to expand issues for 30(b)(6) deposition
07/15/05	8.80	MFK	review and revise 30(b)(6) deposition outline in preparation of deposition; review supplemental production of documents brought to deposition by GMP, including invoices, and email correspondence; meetings with D. Sutton and P. Alston re continuing deposition due to document production and producing W. Guirguis as additional 30(b)(6) deponent; take deposition of GMP's 30(b)(6) deponent P. Melnky
08/09/05	0.10	PA	review transcript of deposition of Peter Melnyk
08/10/05	0.20	MFK	call to R. Sutton (left message) and email on scheduling of depositions and supplemental production; call with J. Carmicheal re deposition of P. Melynky and status of case
08/11/05	0.40	MFK	emails and meeting with P. Alston on additional witnesses required to be deposed pursuant to GMP's initial disclosures and case strategy on depositions and filing of motion